

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION

STAR KNESE,

Case No. 2:21-cv-00990

Plaintiff,

v.

AMAZON.COM SERVICES LLC,

Defendant.

COMPLAINT

NOW COMES Plaintiff Star Knese, by her attorneys, the law firm of GINGRAS THOMSEN & WACHS LLP, by Attorney William F. Sulton, and files this complaint against Defendant Amazon.com Services LLC.

I. Introduction

1. Star Knese was new to the job market in August 2020. Her job at Amazon.com Services, LLC, as a warehouse worker, was her first out of high school. But she knew it was illegal for male coworkers to direct catcalls and sexual comments at her. Ms. Knese, along with other women, complained to human resources. Rather than dealing with the pervasive sexual harassment and hostile working environment for female employees, Amazon chose instead to fire Ms. Knese. This lawsuit seeks legal redress.

II. Parties

A. Plaintiff

2. Plaintiff Star Knese (“Ms. Knese”) is a woman and worked for Defendant Amazon Services, LLC at its MKE1-FC location in Kenosha, Wisconsin. Ms. Knese resides and is domiciled in the Eastern District of Wisconsin.

B. Defendant

3. Defendant Amazon.com Services LLC (“Amazon”) is headquartered in Seattle, Washington, and does substantial business in the State of Wisconsin. Amazon employed Ms. Knese at its MKE1-FC location in Kenosha, Wisconsin.

III. Jurisdiction and Venue

4. The United States District Court for the Eastern District of Wisconsin (“Eastern District of Wisconsin”) has jurisdiction over the claims and parties pursuant to 28 U.S.C. § 1331 because Ms. Knese alleges violations of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e-2(a) and § 2000e(3)(a).

5. Venue in the Eastern District of Wisconsin is proper pursuant to 28 U.S.C. § 1331(b)(2) because the events giving rise to this complaint occurred within this judicial district.

6. Ms. Knese filed charges of discrimination and retaliation within 300 days of the events complained of with the United States Equal Employment Opportunity Commission (“EEOC”) on January 16, 2021. On January 24, 2021,

EEOC issued a Notice of Suit Rights. Ms. Knese has filed this complaint within 90 days of the Notice of Suit Rights. All conditions precedent to filing this lawsuit have been met or have otherwise occurred.

IV. Facts

7. Ms. Knese, whose sex is female, started working at Amazon in Kenosha in August 2020.

8. Ms. Knese was a warehouse worker (Amazon uses the term “Fulfillment Associate”).

9. Beginning in or about November 2020, Ms. Knese (and other female employees) were subjected to severe and pervasive sexual harassment by male coworkers. The sexual harassment included, without limitations, catcalling and sexual comments.

10. In or about December 2020, Ms. Knese (and other female employees) complained to human resources about the sexual harassment and Amazon’s hostile working environment for female employees.

11. Amazon retaliated against Ms. Knese by firing her.

12. Amazon did not train the male employees who subjected Ms. Knese to sexual harassment on anti-harassment. Amazon’s training failures caused the sexual harassment to occur.

13. Amazon did not supervise the male employees who subjected Ms. Knese to prevent sexual harassment and a hostile working environment based on sex. Amazon’s supervision failures caused the sexual harassment to occur.

14. Amazon failed to appropriately investigate Ms. Knese's sexual harassment complaint. Amazon's investigation failures caused the retaliation to occur.

15. Amazon hired human resources staff and other supervisors who lacked an appropriate amount anti-harassment and anti-retaliation experience. Amazon's hiring failures caused the sexual harassment and retaliation to occur.

16. Amazon did not train the human resources staff and other supervisors who fired Ms. Knese on anti-harassment and anti-retaliation. Amazon's training failures caused the sexual harassment and retaliation to occur.

17. Amazon did not supervise the human resources staff and supervisors who fired Ms. Knese to prevent sexual harassment, prevent a hostile working environment for female employees, and prevent retaliation from occurring. Amazon's supervision failures caused the sexual harassment and retaliation to occur.

18. Amazon's unlawful conduct caused Ms. Knese to suffer damages and injuries, without limitation for lost wages and benefits; lost future wages and benefits; and emotional pain, suffering, inconvenience, mental anguish, and loss of enjoyment of life.

V. Claims for Relief

19. Ms. Knese incorporates here all other allegations in this complaint.

20. Amazon's employees subjected Ms. Knese to sexual harassment in violation of 42 U.S.C. § 2000e-2(a) by making sexual comments to her.

21. Amazon's employees retaliated against Ms. Knese in violation of 42 U.S.C. § 2000e-3(a) by firing her after she complained about sexual harassment.

22. Amazon was negligent in its training and supervision of the male employees who subjected Ms. Knese to sexual harassment.

23. Amazon was negligent in its investigation of Ms. Knese's sexual harassment complaint.

24. Amazon was negligent in its hiring, training, and supervision of the human resources staff and others who fired Ms. Knese (or caused Ms. Knese to be fired) for complaining about sexual harassment.

25. Amazon unlawfully maintains a working environment that hostile to female employees, on account of their sex.

26. Amazon's unlawful conduct caused Ms. Knese to suffer damages and injuries, without limitation for lost wages and benefits; lost future wages and benefits; and emotional pain, suffering, inconvenience, mental anguish, and loss of enjoyment of life.

VI. Relief Requested

27. Ms. Knese respectfully requests that the Court enter judgment for her and against Amazon, and provide the following relief:

- a. A declaration stating, among other things, that Amazon subjected Ms. Knese to sexual harassment and fired her for complaining in violation of Title VII of the Civil Rights Act of 1964.
- b. An order awarding damages for lost wages and benefits.
- c. An order awarding damages for lost future wages and benefits.
- d. An order awarding damages for emotional pain, suffering, inconvenience, mental anguish, and loss of enjoyment of life.
- e. An order awarding punitive damages.
- f. An order awarding attorneys' fees.
- g. An order awarding experts' fees.
- h. An order awarding taxable costs and disbursements.
- i. An order awarding pre- and post-judgment interest on all awarded relief.
- j. An order granting such further and necessary relief as determined by the Court.

VII. Jury Demand

28. Ms. Knese hereby demands trial by jury on each of her claims.

Dated at the law office of GINGRAS THOMSEN & WACHS LLP in Milwaukee, Wisconsin, on this 23rd day of August, 2021.

/s/ William F. Sulton
WILLIAM F. SULTON

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